UPLAND CLEANUP ACTION COMPLETION REPORT

Harris Avenue Shipyard Site

Prepared for: Port of Bellingham

Project No. 210195 • August 28, 2026 FINAL

Aspect
A Geosyntec Company

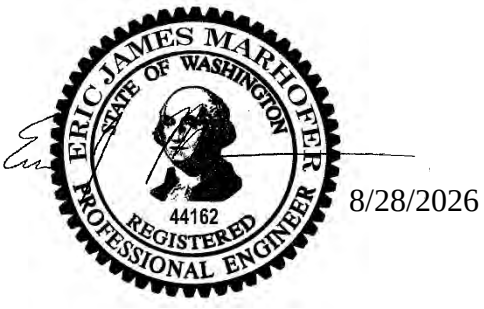
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8/28/2026

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Contents

1 Introduction 1
1.1 Background 1
1.2 Site Description 1
1.3 Geologic Setting 2
1.4 Upland Cleanup Action Summary 2

2 Remedial Action Objectives and Cleanup Standards 4
2.1 Cleanup Standards 4
2.1.1 Soil Cleanup Levels and Points of Compliance 5
2.1.2 Groundwater Cleanup Levels and Points of Compliance 5

3 Upland Cleanup Activities 6
3.1 Mobilization and Site Preparation 6
3.1.1 Temporary Erosion and Sediment Controls 6
3.1.2 Construction Stormwater General Permit 6
3.1.3 Aerated Stabilization Basin Discharge Authorization 7
3.1.4 Preconstruction Submittal Review and Approval 7
3.2 Above Ground Structure Demolition and Disposal 7
3.2.1 Regulated Building Material Management and Disposal 8
3.2.2 Water Treatment Area 8
3.2.3 Oil Storage Canopy Area 9
3.3 Below Ground Structure Demolition and Disposal 9
3.3.1 Pavements and Subsurface Obstructions 9
3.3.2 Subsurface Utility Removal and Selective Replacement 10
3.3.3 Monitoring Well Decommissioning 11
3.3.4 Underground Storage Tank Removal and Disposal 11
3.4 Soil Excavation, Management, and Stockpiling 12
3.4.1 CA 1 Excavation for Cap Placement 12
3.4.2 CA 2 Deeper Excavation for Metals Source Removal 12
3.4.3 Verification Sampling and Results 12
3.4.4 Stockpile Management 13
3.5 Excavation Dewatering and Water Management 14
3.6 Soil Loading and Off-Site Disposal 14
3.7 Backfill and Compaction 14
3.7.1 Subgrade Preparation 14
3.7.2 Gravity Block Wall Construction 15
3.7.3 Separation Geotextile 16
3.7.4 Backfill Materials 16
3.7.5 Backfill Compaction 16
3.8 Stormwater System Replacement 16

3.9 Archeological Monitoring 17

4 Upland Cleanup Action Results and Conclusion 19

5 References 20

6 Limitations 21

List of Tables

1 Cleanup Levels for Contaminants of Concern

2 Verification Soil Sample Results

List of Figures

1 Site Location and Cleanup Areas

2 Verification Soil Sample Locations

List of Appendices

A Construction Stormwater General Permit

B ASB Discharge Authorizations

C Certificates of Disposal for Non-Hazardous Materials

D Regulated Building Material Abatement and Disposal Records

E Waste Disposal Manifests

F As-Built Plan Set

G Record Drawings for City Water Main Replacement

H Monitoring Well Decommissioning Records

I UST Site Assessment Checklist Report

J Laboratory Analytical Reports for Soil Samples

K Three-Part Soil Compliance Calculations

L Backfill Compaction Testing Results

M Archeological Monitoring Report

Acronyms

AO	Agreed Order
ASB	Aerated Settling Basin
Aspect	Aspect Consulting, LLC
bgs	below ground surface
CA	cleanup area
CAP	Cleanup Action Plan
CQA	Construction Quality Assurance and
CMP	Compliance Monitoring Plan
cPAHs	carcinogenic polycyclic aromatic hydrocarbons
CSBC	crushed surfacing base course
CSGP	Construction Stormwater General Permit
DAHP	Washington Department of Archeological and Historical Preservation
EAS	Environmental Abatement Services
Ecology	Washington Department of Ecology
EDR	Engineering Design Report
IDP	Inadvertent Discovery Plan
MDD	maximum dry density
mg/kg	milligrams/kilograms
MNA	monitored natural attenuation
MTCA	Model Toxics Control Act
NPDES	National Pollutant Discharge Elimination System
PAH	polycyclic aromatic hydrocarbons
PCB	polychlorinated biphenyls
PSSP	polyethylene storm sewer pipe
RAO	Remedial Action Objectives
RI/FS	Remedial Investigation/Feasibility Study
SMS	Sediment Management Standards

SWPPP	Stormwater Pollution Prevention Plan
TESC	temporary erosion and sedimentation control
UCL	upper confidence limit
WAC	Washington Administrative Code

1 Introduction

Aspect Consulting, a Geosyntec Company, (Aspect) has developed this Cleanup Action Completion Report for the upland unit of the Harris Avenue Shipyard (the Site) located in Bellingham, Washington (Figure 1). This report is deliverable B.3 in Exhibit C, Schedule of Deliverables for Consent Decree No. 2520116037. As discussed with the Washington State Department of Ecology (Ecology), the Port of Bellingham (Port) elected to complete the cleanups for the upland and in-water units of the Site separately. This report documents the completion of the planned cleanup action for the upland unit.

1.1 Background

The Site is located at 201 Harris Avenue in Bellingham, Washington (Figure 1). Uplands and in-water portions of the Site have been used for industrial purposes, primarily as a shipyard, for about 100 years. Ecology designated the Site boundaries by the extent of identified contamination through investigations of soil, groundwater, and sediment quality within the study area. Both the upland and in-water portions of the Site are regulated by the cleanup process under the Model Toxics Control Act (MTCA), Revised Code of Washington 70.105D, and Washington Administrative Code (WAC) Chapter 173-340, administered by Ecology. The in-water portion of the Site is also regulated under the Sediment Management Standards (SMS) and WAC 173-204.

In 1998, the Port began voluntarily investigating sediment quality at the Site. Based on this work, Ecology and the Port entered into an Agreed Order (AO) in 2003 to complete a Remedial Investigation/Feasibility Study (RI/FS) for Site sediments. In 2010, Ecology and the Port entered into a new AO (No. 7342 and associated First Amendment) to incorporate upland areas of the Site into a single RI/FS and Cleanup Action Plan (CAP; Ecology 2021). The final RI/FS was issued in 2019 (Floyd|Snider 2019a). In 2021, AO No. 7342 (as amended) was replaced by a new AO (No. DE 19450), which requires design of the cleanup action as described in the CAP (Exhibit B to the AO). Ecology determined that a cleanup performed in accordance with the CAP would comply with the requirements for selection of a remedy under WAC 173-340-360 (MTCA) and WAC 173-204 (SMS).

In accordance with the AO, Aspect prepared an Engineering Design Report (EDR; Aspect 2023) to present the 30 percent level design for the upland Cleanup Action. Design details were further defined in subsequent Construction Plans and Specifications. The cleanup of the upland unit was formalized by Consent Decree No. 2520116037 in April 2025 and substantially completed between October 2025 and March 2026.

1.2 Site Description

The Site consists of approximately 5 acres of upland and 5 acres of in-water area, totaling 10 acres (Figure 1). The cleanup documented in this report is only for the upland unit of the Site. The upland is bordered on the north and west by Bellingham Bay and on the south by the City of Bellingham's (City) Marine Park and the BNSF Railway rail lines.

The parcel to the east of the Site is owned by the Port and leased to a fish processing company.

1.3 Geologic Setting

A detailed description of Site geology can be found in the RI/FS (Floyd|Snider 2019a). The Geologic Map of the Bellingham 1:100,000 Quadrangle (Lapen, 2000) indicates the Site is underlain by the Padden Member of the Chuckanut Formation (map symbol ECcp). The ECcp unit is described as moderately to well-sorted sandstone and conglomerate alternating with mudstone and minor coal. Although not indicated in geologic mapping, on the east side of the Site the ECcp is overlain by glacial till, a well-consolidated, poorly sorted mixture of gravel and cobbles in a matrix of silt, clay, and sand that was deposited by ice from the main advance of the last major continental glaciation. The remaining upland unit of the Site was constructed in the early 20th century by placing up to 15 feet of dredged sediments on the western and northern edges of the Site. The Geomorphic Map of Western Whatcom County (Kovanen et al., 2020) shows that the Site is underlain by modified land (map symbol m), defined as a filled or graded area, which is consistent with the Floyd|Snider's interpretation in the RI/FS.

1.4 Upland Cleanup Action Summary

Ecology's selected cleanup action for soil and groundwater was a comprehensive final remedy for the upland unit of the Site and designed to comply with applicable remedy selection requirements under MTCA. Figure 1 shows the three upland cleanup areas (CAs) that were defined in the CAP as follows:

- **CA 1** encompasses shallow soils outside of CA 3 containing elevated concentrations of metals. Concentrations of metals are present in shallow soil throughout the upland unit at concentrations above cleanup levels due to the long history of industrial site use.
- **CA 2** is an area of deeper soil impacts containing concentrations of copper and zinc representing a source of those metals to nearshore groundwater.
- **CA 3** is an area that was previously cleaned up during an interim action in 2018 (Floyd|Snider, 2019b) but has residual concentrations of polycyclic aromatic hydrocarbons (PAHs) exceeding groundwater cleanup levels (specifically 1-methylnaphthalene).

The CAP-specified cleanup action for the upland CAs, as further refined during the engineering design process, included the following:

- **Shallow Soil Source Removal and Capping in CA 1:** Removal of up to 3 feet of contaminated soil and placement of a 2-foot-thick gravel cap across CA 1 to facilitate raising the shoreline elevation to protect against future sea level rise while achieving grading requirements for the replacement stormwater system. Excavated soil was disposed of off-site at a permitted facility. A geotextile indicator fabric was installed over the excavated area to prevent mixing of clean imported fill material with contaminated subsurface material and to provide a visible indicator of that interface during any future subsurface work. Excavated

areas were capped with a compacted gravel surface meeting Site operational requirements with installation of appropriate stormwater drainage controls. Cleanup activities for CA 1 are documented in Section 3.

- **Deeper Soil Source Removal in CA 2:** Excavation of deeper copper- and zinc-contaminated soil contributing to localized copper and zinc exceedances in shoreline groundwater. The lateral extents of the planned excavation for CA 2 were refined in the EDR based on an analysis of results from the Pre-Remedial Design Investigation data collection effort and earlier soil sampling (Aspect, 2023). The final extents of the excavation were based on verification soil sampling results and statistical analysis as described in Section 3.4.3.
- **Monitored Natural Attenuation of Groundwater in CA 2 and CA 3:** The selected cleanup includes monitored natural attenuation (MNA) of groundwater for metals in CA 2 and PAHs (namely 1-methylnaphthalene) in CA 3 until compliance with cleanup standards are achieved. Post-cleanup groundwater monitoring requirements and potential contingency actions for the upland cleanup area have been provided to Ecology in a draft Upland Post-Remedy Compliance Monitoring Plan under separate cover (Anchor, 2026).
- **Institutional Controls:** The selected cleanup includes implementation of institutional controls in the form of an environmental covenant. The covenant will memorialize several general and specific prohibitions, restrictions, and requirements within the upland cleanup unit. The institutional controls will include the requirements in the Upland Post-Remedy Compliance Monitoring Plan which will specify cap inspection/maintenance, soil management, and health and safety requirements for future excavation work. A draft environmental covenant will be provided for Ecology review under separate cover.

2 Remedial Action Objectives and Cleanup Standards

Based on the cleanup standards presented in the CAP, the remedial action objectives (RAOs) for the upland areas at the Site were identified as follows:

1. **Protection of human health from direct contact with and ingestion of contaminated soil and groundwater through capping of contaminated soil and institutional controls.** Permanent removal of shallow metals-contaminated soil in CA 1 and placement of a gravel cap to provide protection from direct contact with soil. Implement institutional controls to ensure continued protection from direct contact with soil and restrict groundwater use.
2. **Protection from soil contamination leaching to groundwater through excavation of contaminated soil.** Permanent removal of metals-contaminated soil at depth in CA 2 to achieve cleanup levels protective of soil contamination leaching to groundwater and enhance natural attenuation of groundwater impacts.
3. **Protection of surface water and sediment quality from groundwater contamination through MNA and institutional controls.** Implement MNA of metals- and PAH-contaminated groundwater in CA 2 and CA 3, respectively. Implement institutional controls to ensure continued protection of surface water and sediment quality from metals and PAH contamination.
4. **Protection from inhalation of vapors.** There are no buildings at the Site with on-grade or below-grade foundations within 30 feet of TPH contamination; therefore, there is no risk of vapor intrusion into buildings (Floyd|Snider, 2019a). Prior to future Site development involving occupied structures, vapor intrusion risk will be evaluated in consultation with Ecology using the most current and appropriate vapor intrusion guidance documents (Ecology, 2021).

The completed soil removal action and capping activities to meet these RAOs are documented in Section 3. MNA requirements for the protection of surface water and sediments, as well as restrictions for protection of the vapor pathway will be institutionalized in the form of an Upland Post-Remedy Compliance Monitoring Plan and environmental covenant under separate covers.

2.1 Cleanup Standards

A cleanup standard consists of a cleanup level for a hazardous substance present at a site, combined with the location where the cleanup level must be met (point of compliance), and other regulatory requirements that apply to the cleanup action (“applicable state and federal laws”). The Site soil and groundwater cleanup levels and points of compliance are described below.

2.1.1 Soil Cleanup Levels and Points of Compliance

Table 1 lists the CAP's soil cleanup levels for the contaminants of concern for the upland unit, including which upland cleanup area the cleanup levels apply to. The point of compliance for soil cleanup levels based on groundwater protection is all depths. The point of compliance for soil cleanup levels based on the (industrial) direct-contact exposure pathway is from the ground surface to 15 feet below ground surface (bgs).

2.1.2 Groundwater Cleanup Levels and Points of Compliance

Table 1 also lists the CAP's groundwater cleanup levels for the contaminants of concern for the upland unit. The cleanup levels are based on groundwater discharge to Bellingham Bay sediment and surface water. Because the highest beneficial use of Site groundwater at the Site is discharge to Bellingham Bay, the CAP set a groundwater conditional point of compliance at the point of groundwater discharge to sediment.[1]

[1] Groundwater discharges to sediment prior to discharging to the overlying surface water.

3 Upland Cleanup Activities

The Port selected Strider Construction (Strider) as the Contactor for the implementation of the soil removal action and cap construction. Aspect served at the Port's Engineer providing oversight of the Contractor and conducting monitoring to ensure compliance with the construction plans and specifications, and associated permits. The following sections describe the completed activities associated with the upland cleanup.

3.1 Mobilization and Site Preparation

Strider mobilized to the Site in September 2025. Site preparation activities included the following:

- Mobilizing construction equipment and materials to the Site.
- Performing a public and private utility locate.
- Constructing a bermed and lined stockpile area(s) for contaminated soil pending transportation for off-site landfill disposal and a separate stockpile area for inert debris pending transportation for off-site recycling.
- Constructing temporary erosion and sedimentation controls, including installation of a stabilized construction entrance, to ensure no materials track out and no construction stormwater leaves the Site throughout the cleanup earthwork.
- Establishing perimeter fencing for Site security.

3.1.1 Temporary Erosion and Sediment Controls

To prevent Site erosion during construction, Strider erected and maintained appropriate temporary erosion and sedimentation control (TESC) measures in accordance with the Construction Plans and Specifications and a Stormwater Pollution Prevention Plan (SWPPP) prepared for the project. This included a temporary construction exit, in accordance with City of Bellingham development guidelines. If track-out of material was noted after a construction vehicle left the Site, Strider immediately removed the tracked-out material. Other TESC measures included silt fencing around the perimeter of the work area, compost socks, catch basin inlet protection socks, and using plastic to cover soil stockpiles.

Strider maintained TESC measures daily during construction. During the 5 months of construction, no turbid water was discharged to the Bay, no reportable track-out was observed, and no off-site sedimentation occurred.

3.1.2 Construction Stormwater General Permit

Prior to construction activities, the Port obtained a Construction Stormwater General Permit (CSGP) with project-specific Administrative Order issued by Ecology. The CSGP was required due to the size of the planned ground disturbance and known contamination at the Site. A copy of the CSGP is included in Appendix A for reference.

The CSGP was transferred to Strider prior to breaking ground. However, the cleanup project was maintained as a zero-discharge site throughout construction. Precipitation during construction was infiltrated within the project limits or otherwise contained within

the existing stormwater system catchment during construction. At the end construction, the limited amount of stormwater contained within the catchment of the former stormwater system was pumped out and disposed of as described in Section 3.5.

3.1.3 Aerated Stabilization Basin Discharge Authorization

Prior to construction activities, the Port also obtained Ecology's authorization to discharge dewatering and stormwater accumulating within the project limits to the Port's Aerated Settling Basin (ASB) under their National Pollutant Discharge Elimination System (NPDES) permit for the facility. The letter requesting Ecology's authorization and Ecology's subsequent approval letter are included in Appendix B for reference.

3.1.4 Preconstruction Submittal Review and Approval

Prior to beginning construction, Strider prepared and transmitted several submittals for review including:

- TESC measures and materials
- An adopted SWPPP
- Pipe, fittings, manholes, and fire hydrant materials
- Contech Modular Wetland
- A demolition and abatement work plan
- Aggregate materials to be used for fill materials and concrete pads
- Catch basins and manholes
- A site-specific health and safety plan
- An excavation and water management plan
- Sluice gates and check valves
- Stormwater pretreatment vault
- Electrical components and materials
- Ecology blocks for the gravity block wall

Aspect reviewed each submittal and approved, approved with notes, or requested revisions and submittal. All resubmittals were approved.

3.2 Above Ground Structure Demolition and Disposal

Prior to the soil removal activities, several buildings and other aboveground structures at the Site were demolished to allow access for the CA 1 and CA 2 remediation activities.

Strider demolished the water treatment building and associated treatment-related infrastructure (including five adjacent water tanks), sandblast shed, paint shop, winch house, conex building, and paint building in accordance with the Construction Plans and Specifications. During the course of the cleanup activities, the Port also elected to have Strider demolish the shipping and receiving building and oil storage canopy area on the eastern edge of the property boundary.

Prior to demolition activities, Strider and their subcontractor, Environmental Abatement Services (EAS), abated all regulated building materials (asbestos, lead-based paint, etc.) identified in the structures.

The concrete pavement around the paint shop, sandblast shed, and oil storage canopy area and the foundations for aboveground structures and water treatment infrastructure were also demolished and removed during the upland cleanup.

For reference, the maintenance and fabrication shop, the warehouse and associated office trailers, and the restroom trailer were not demolished as part of the cleanup.

Concrete, metal, and other non-hazardous debris (including asphalt, wood, plastic, and fiberglass) were hauled off-site for disposal. Approximately 1,318 tons of recyclable concrete was taken to Dirt Works Hannegan Recycle Yard in Bellingham, Washington; approximately 160 tons of recyclable metal was taken to Scrap-It in Ferndale, Washington; and approximately 41 tons of additional non-hazardous demolition debris was taken to RDS Recycling and Disposal Services in Ferndale, Washington. Certificates of disposal for non-hazardous waste streams are provided in Appendix C.

Regulated building materials were abated by EAS prior to demolition activities as discussed in Section 3.2.1. Regulated building materials were disposed of at the Wasco County Landfill in Dulles, Oregon. EAS job notes, air monitoring results, and disposal records are provided in Appendix D for reference.

Other hazardous materials encountered during cleanup activities included gasoline in an above ground storage tank during demolition of the oil storage area and various chemical containers stored in buildings. The hazardous materials were profiled and properly disposed of at Chemical Waste Management in Arlington, Oregon. Waste manifests for hazardous material disposal are provided in Appendix E for reference.

3.2.1 Regulated Building Material Management and Disposal

Prior to demolition, Med-Tox Northwest surveyed all structures to be demolished and identified regulated building materials that needed to be address during demolition (including asbestos-containing materials, mercury-containing and polychlorinated-biphenyl-containing electrical components, and lead-based paint). The regulated building material survey reports were provided to Strider prior to demolition activities and are included in Appendix D.

EAS abated, removed, and disposed of the regulated building materials identified in the structures prior to structure demolition. Med-Tox inspected the structures after EAS removed and encapsulated the regulated building materials and confirmed the material had been properly abated. The records of the material abatement and disposal are in Appendix D.

3.2.2 Water Treatment Area

Prior to demolition of the water treatment building and associated treatment-related infrastructure (including five adjacent water tanks) it was noted that the water storage tanks contained approximately 14,800 gallons of uncharacterized process water. The water in the tanks was pumped to a temporary holding tank already staged on-site for containment of potential dewatering and stormwater. The water was sampled and

analyzed for metals, petroleum hydrocarbons, carcinogenic polycyclic aromatic hydrocarbons (cPAHs), and polychlorinated biphenyls (PCBs). The results fell within the range of concentrations previously disclosed to Ecology in the original request for authorization to discharge dewatering and stormwater to the ASB. Therefore, the analytical results were submitted to Ecology along with an additional request to discharge the process water to the Port's ASB. Ecology's authorization of this additional non-routine discharge to the ASB and the laboratory analytical report and are provided in Appendix B along with records of observations at the time of discharge.

3.2.3 Oil Storage Canopy Area

Prior to demolition of the oil storage area, Strider's subcontractor DH Environmental (DHE) sampled several small containers of miscellaneous chemicals that were aggregated from across the Site and stored under the canopy. DHE also sampled the product stored in an above-ground storage tank located within the oil storage area. Finally, a composite sample of accumulated sediments in three oil-water separators located within the oil storage area was collected to profile for disposal prior to removal and disposal of those structures. Manifests for disposal of hazardous materials are provided in Appendix E for reference.

Various chemicals were identified in the small containers as listed on the hazardous waste manifest form. The product stored in the above-ground storage tank was determined to be gasoline. The gasoline was pumped out for disposal, and the tank was rinsed for disposal as scrap metal. Hazardous materials were disposed of at Chemical Waste Management in Arlington, Oregon.

Non-hazardous rinse water from the above-ground tank was combined with rinse water from decommissioning an underground storage tank that was discovered at the Site around the same time during the cleanup (approximately 2,700 gallons; see Section 3.3.4). The oily water was pumped and hauled to Marine Vacuum Services in Seattle, Washington, for disposal. A copy of the manifest is provided in Appendix E.

As a result of bioassay testing, the sediment in the oil-water separators was also determined to be non-hazardous. Copies of the bioassay test results and the non-hazardous waste manifests are also included in Appendix E.

3.3 Below Ground Structure Demolition and Disposal

Throughout the excavation process, various subsurface obstructions and utilities were encountered and managed as described in the following sections.

3.3.1 Pavements and Subsurface Obstructions

After building and structure demolition and prior to excavation, Strider demolished and removed concrete pavement, asphaltic pavement, and other at-surface and subsurface concrete structures that would have interfered with soil removal and achievement of design subgrade. Concrete was hauled to Dirt Works Hannegan Recycle Yard in Bellingham, Washington, for recycling. Asphalt was collected with other non-hazardous demolition debris and hauled to RDS Recycling and Disposal Services in Ferndale, Washington. Certificates of disposal for non-hazardous waste streams are provided in Appendix C.

3.3.2 Subsurface Utility Removal and Selective Replacement

Various inactive buried utilities, including stormwater, water, electrical, and communication lines, were demolished and removed where they interfered with cleanup activities. The plastic, metal, concrete, and asphalt demolition debris was disposed of along with the nonhazardous waste streams from above ground demolition activities as described in Section 3.2. Selected buried utilities were partially or fully replaced or upgraded per the construction plans and requests or requirements from the Port and City as discussed below.

3.3.2.1 Stormwater Infrastructure

Stormwater pipelines and catch basins that were not compatible with the project stormwater design were demolished and the materials (plastic, concrete, metal) disposed of with the nonhazardous waste streams from above ground demolition activities as described in Section 3.2. Four catch basins and three pipelines were preserved and integrated into the new stormwater system. Refer to Section 3.8 for a description of the Site's stormwater system.

3.3.2.2 Water Lines

Three water lines were partly or wholly demolished before and during excavation, then restored to their previous or modified locations and functions as follows.

- A City-owned 8-inch ductile iron water line feeding two fire hydrants was substantially removed to accommodate project excavation. One section of the 8-inch line that was to be removed contained asbestos, and that pipe section was encapsulated by subcontractor EAS before it was removed and disposed of. The restored water line location is shown on the as-built drawings in Appendix F (Sheet C-03). The water line work was done under City Permit PFC2025-0007, as amended. Record drawings for the work on the City water line are included in Appendix G.
- A Port-owned 4-inch PVC water line that fed water spigots at the stub pier was demolished, as it interfered with excavation in the cleanup areas. The line and spigots were replaced in approximately the same locations, as shown in the as-built drawing in Appendix F (Sheet C-03).
- A Port-owned 1-inch PVC water line that fed the restroom and office trailers was also partially demolished where it conflicted with excavation for cleanup and installation of a new stormwater line. It was restored in the same location, as shown on the as-built drawings in Appendix F (Sheet C-03).

3.3.2.3 Communication Lines

A PVC conduit holding communication wire was demolished where it conflicted with excavations and installation of new stormwater lines. The conduit was restored to run from the office trailer to a communication vault on the east side of the Site. The conduit was installed without communication wiring but with a trace cord that can be used to pull wiring through if and when a future tenant needs it. The location is shown on the as-built drawings in Appendix F (Sheet C-03).

3.3.2.4 Natural Gas

A natural gas line and meter that supplied the shipping and receiving building was demolished when that building was demolished. The gas line was capped at the point where it crossed the parcel line onto the Site.

3.3.2.5 Electrical Modifications

Several electrical vaults and panels were protected in-place and raised to match the final grade following the cleanup. Electrical lines that conflicted with excavations were removed and replaced as part of restoration activities. The power transformer located in the northwest corner of the property was determined not to be serviceable and was not replaced following the cleanup. The locations of previously existing electrical elements that were modified during the cleanup are shown on the as-built drawings in Appendix F (Sheet C-03).

3.3.3 Monitoring Well Decommissioning

Seven existing groundwater monitoring wells within the limits of construction were decommissioned during cleanup activities. One additional monitoring well (MW-03) was not encountered during excavation activities and is presumed to be destroyed. The decommissioned and presumed destroyed wells are tabulated below.

Monitoring Well Number	Ecology Well Tag	Disposition
MW-02A	BHB119	Decommissioned
MW-02	AEE527	Decommissioned
MW-03	AEE528	Not found, presumed destroyed
MW-04	AEE529	Decommissioned
MW-05	AEE530	Decommissioned
MW-07	BHB120	Decommissioned
MW-08	BHB118	Decommissioned
MW-12	BJA550	Decommissioned

Monitoring wells were decommissioned in-place by a licensed driller or professional engineer by chipping in-place with bentonite. Portions of the well casings that conflicted with the excavation were removed. Decommissioning reports were filed with Ecology and are included in Appendix H for reference.

3.3.4 Underground Storage Tank Removal and Disposal

A previously unknown 1,200-gallon steel underground storage tank containing a few inches of oily water was encountered during cleanup activities. The tank was emptied, cleaned, and removed for disposal. At the time of the tank removal, a site assessment was performed in accordance with Ecology's Guidance for Site Checks and Site Assessments for Underground Storage Tanks (Ecology 2022). The results of the site assessment did not indicate that there had been a release of regulated substances from the unknown UST. A copy of the Site Assessment Report and Checklist Responses are provided in Appendix I for reference.

3.4 Soil Excavation, Management, and Stockpiling

The contaminated soil excavation extended to depths up to 3 feet below grade in CA 1, with deeper excavations to a maximum depth of 9 feet in CA 2. Subgrade excavation areas are shown on the as-built drawings in Appendix F (Sheets C-01 and C-02). The following sections discuss soil excavation, verification sampling, and stockpile management.

3.4.1 CA 1 Excavation for Cap Placement

Cleanup for CA 1 included excavation as needed to install a 2-foot gravel cap. As part of the cleanup, the shoreline elevation was also raised to provide protection from future sea level rise and the final grading design needed to facilitate drainage for the replacement stormwater system. Therefore, the excavation depth varied across CA 1 as shown on the as-built drawing in Appendix F (Sheet C-01). Once the design subgrade was achieved through cutting or filling with clean gravel borrow, an additional 1-foot of gravel borrow topped with 1-foot of crushed surfacing base course (CSBC) was installed to provide the required 2-foot cap across the upland cleanup unit within the project limits (outside of CA 3 and marine railway area).

Where at-surface or subsurface structures, such as building foundations or other buried structures, interfered with achieving the designed subgrade elevation, Strider removed the structures and disposed of them, as described in Section 3.3.

3.4.2 CA 2 Deeper Excavation for Metals Source Removal

Cleanup for CA 2 included deeper excavations of up to 9 feet bgs to reduce the source of metals (specifically copper and zinc) in soil below cleanup levels protective of the soil leaching to the groundwater pathway, thereby enhancing the natural attenuation of groundwater impacts and providing protection of Bellingham Bay surface water and sediment. The excavation extents of metals-impacted soils removed from CA 2 are shown on the as-built drawings in Appendix F (Sheet C-02).

For excavations deeper than 4 feet in CA 2, Strider graded the excavation sidewalls at a gradient no steeper than 1:1 (Horizontal: Vertical), which eliminated the need for temporary shoring. The sidewalls were stable for the few days that the excavations stayed open.

3.4.3 Verification Sampling and Results

There were no verification soil sampling requirements for CA 1, because the metals-impacted soils in CA 1 were only removed as needed to facilitate installation of a 2-foot-thick, clean gravel cap to match the final design grade.

For the excavation of metals-impacted soils in CA 2, verification soil samples were collected from the excavation sidewalls and floor to confirm that soil quality at the extents of the excavation comply with cleanup levels for the protection of groundwater. Soil sampling locations, collection methods, and analytical requirements for verification sampling were performed in accordance with the Ecology approved Construction Quality Assurance and Compliance Monitoring Plan (CQA&CMP; Aspect, 2024). Where soil sampling results did not meet compliance criteria, the excavation was expanded to remove additional soil. The final soil sampling locations and excavation extents are

shown on Figure 2. Analytical results for the soil samples collected during the excavation are summarized in Table 2. Laboratory analytical reports for soil samples are provided in Appendix J.

As described in the EDR, the residual in-place soil quality was evaluated by applying the MTCA three-part compliance criteria to confirm compliance with cleanup levels (WAC 173-340-740(7)(d) and (e)), where compliance is defined as follows

- all residual soil concentrations are less than or equal to two times the target cleanup level;
- the frequency of soil sample exceedance is less than 10 percent; and
- the 95 percent upper confidence limit (95 percent UCL) on the mean concentration is less than the target cleanup level. For this evaluation, the 95 percent UCL values were calculated using EPA's ProUCL version 5.2 software[2].

After updating the full data set provided in the EDR[3] by replacing over-excavated sample locations with the verification sample results, it was determined that compliance with cleanup levels was achieved as follows

- there are no longer any exceedances greater than the cleanup level;
- fewer than 10 percent of the total sample set exceed the cleanup level; and
- the 95 percent UCL on the mean concentration is 141 milligrams/kilograms (mg/kg) for copper and 263 mg/kg for zinc (i.e., well below their respective cleanup levels).

The full data set updated with verification sample results and the ProUCL 95 percent UCL calculations for the updated data sets are included in Appendix K (Tables K-1 through K-3).

3.4.4 Stockpile Management

Before beginning excavation, Strider built a stockpile area on the east side of the Site adjacent to the construction entrance. The stockpile area was constructed in compliance with the project specifications and industry best practices, including being underlain by scrim-reinforced 10-mil-thick plastic sheeting, surrounded by a berm, and the plastic sheeting draped over the berm bathtub-style. All soil excavated at the Site, whether generated by excavation explicitly part of the cleanup for CA 1 and CA 2 or by excavation to allow removal or installation of subsurface utilities, was hauled from the area, and it was excavated to the stockpile by means of an offroad dump truck.

Whenever the stockpile was not being used, and every afternoon before Strider left the Site, the stockpile was covered with 10-mil-thick plastic sheeting. The sheeting was anchored with sandbags. When any water accumulated within the stockpile berm, Strider

[2] EPA's statistical software package for analysis of environmental data sets (https://www.epa.gov/land-research/proucl-software)
[3] Dataset for the CA 2 Area of Influence includes the existing data for soils not excavated plus the new excavation verification data.

pumped it to a tank for storage for holding prior to disposal as discussed in Section 3.5 below.

3.5 Excavation Dewatering and Water Management

The bottom of the excavation in CA 1 was well above the water table (depth to groundwater at the Site ranges from 8 to 12 feet bgs, depending on tides and location at the Site), so no dewatering was necessary for CA 1.

The deepest part of the excavation in CA 2 was 9 feet bgs, within the range of high-tide-influenced groundwater level. However, excavation and soil sampling in CA 2 was performed during lower tides. There was no standing water in the excavation during soil handling and therefore no need for dewatering.

Dewatering was needed for the excavation and installation of manholes MH 3 and MH 4 and the adjacent pretreatment and modular wetland vaults, whose bottom elevations were 10 to 13 feet bgs. The excavation and installation of those structures was conducted during lower low tides to minimize the volume of water that needed to be removed. In addition to water collected during dewatering activities, stormwater was also collected within the existing stormwater system catchment during construction and pumped into temporary storage tanks for settling. Approximately 44,000 gallons of dewatering and stormwater were collected in total. After checking water quality and ensuring there was no sheen or settleable solids, Strider pumped the water from the storage tanks to trucks and hauled the water to the ASB where it was disposed of as non-routine discharge under the NPDES permit for the facility (see Section 3.1.3). Strider measured and reported water quality parameters pH, dissolved oxygen, turbidity, and sheen before discharge. Ecology's discharge authorization for the ASB and Strider's water quality measurements are provided in Appendix B.

3.6 Soil Loading and Off-Site Disposal

Approximately 20,972 tons of metals-impacted soil was excavated from CA 1 and CA 2, including soil excavated during trenching for installation of stormwater system infrastructure and other buried utilities. Stockpiled soil was direct loaded onto trucks waiting at the construction entrance. The soil was hauled to Republic Services and for disposal at the Roosevelt Regional Landfill. A certificate of disposal for the soil is included in Appendix C.

3.7 Backfill and Compaction

During placement and compaction of excavation backfill in CA 1 and CA 2, Strider controlled surface water and groundwater inflow so that the backfill material could be compacted to meet the contract specifications. The final surface was graded to meet the stormwater drainage design in the construction plans and specifications. The final grade is shown on the as-built drawings in Appendix F (Sheets C-03 and C-04).

3.7.1 Subgrade Preparation

Subgrade preparation included removal of all debris, loose fill soils, roots, and any other deleterious materials. When excavation and demolition was complete, Aspect observed the subgrade to ensure it was free of deleterious materials and qualitatively tested the

compaction of the material with a T-probe to confirm it was firm and unyielding. Strider surveyed the elevation of the subgrade in several evenly spaced locations across the Site to confirm and document the correct subgrade elevations were achieved. The final subgrade across the cleanup area is shown on the as-built drawings in Appendix F (Sheet C-01)

The surface soil on the east half of the Site contained a high fines content (soil particles smaller than 75 micrometers in diameter). When wet, soils with high fines content would become difficult to manage and difficult or impossible to compact sufficiently to meet project specifications. To accommodate that, when performing earthwork on high-fines-content soils during wet weather conditions, Strider enacted the following measures, as appropriate:

- Kept high-fines-content soil areas covered with plastic sheeting until earthwork commenced.
- When high-fines subgrade material did get wet, Strider removed the top few inches of wet soil then immediately placed and compacted the specified structural fill.
- Graded the ground surface within the construction area to promote runoff to local low spots or sumps.

On the west and north portions of the Site, the soil was primarily coarse-grained and precipitation rapidly infiltrated. In those parts of the Site, even after several days of rain, no special measures needed to be taken to facilitate easy management of soils and to achieve specified compaction.

3.7.2 Gravity Block Wall Construction

As part of the final Construction Plans and Specifications for the cleanup, a gravity block wall was added along the northern and western project limits to facilitate raising the overall grade of the Site to provide protection from future sea level rise. Strider constructed the block wall along the northern and western project limits to retain the capping material, facilitate grading, and eliminate stormwater runoff.

The wall was constructed of concrete ecology blocks, each 2 feet wide by 2 feet high by 6 feet long. The wall is two blocks high along most of its length, and the elevation of the top of the finished wall in most locations is 16.5 feet, which is up to 2.5 feet higher in elevation than the pre-cleanup site elevation. In some locations, the alignment of the wall was adjusted from the design to accommodate field conditions. The location of the wall alignment is shown on the as-built drawings in Appendix F (Sheet C-03).

Before the blocks were placed, Strider excavated to the design subgrade elevation. An Aspect field representative tested the subgrade with a T-probe to confirm it was firm and unyielding and Strider surveyed the subgrade to document achievement of design elevation. Strider then placed and compacted at least 6 inches of CSBC as a leveling pad. The geotechnical testing subcontractor Certerra-Geotest tested compaction of the leveling pad and confirmed it complied with project specifications. In some locations, the thickness of the leveling pad was insufficient for testing with the nuclear densometer. In

those locations, the subconsultant observed Strider's placement and compaction methods and performed qualitative tests (i.e., testing with a T-probe) to confirm the material was compacted adequately. Results of compaction testing are in Appendix L.

3.7.3 Separation Geotextile

An orange non-woven separation geotextile was installed on top of excavation subgrades to prevent mixing of clean surface gravel with subsurface material and provide an indicator layer for any future subsurface work in accordance with the Construction Plans and Specifications.

3.7.4 Backfill Materials

Gravel borrow was used to backfill the CA 1 and CA 2 excavation areas as needed to achieve subgrade elevations. Following placement of the orange geotextile indicator fabric, Strider placed 1 foot of gravel borrow to an elevation of 1 foot below the final design grade, followed by 1 foot of CSBC to achieve final grade. The gavel borrow and CSBC materials were reviewed by Aspect prior to import and determined to meet the requirements of the Construction Plans and Specifications.

3.7.5 Backfill Compaction

Gravel borrow placed deeper than 2 feet bgs was compacted to 90 percent of the maximum dry density (MDD) as determined by ASTM D1557 or to the satisfaction of an on-site Aspect engineer or geologist. Between 0 and 2 feet bgs, Strider compacted each layer of gravel borrow or CSBC to achieve minimum 95 percent of the MDD as determined by ASTM D-1557 or to the satisfaction of an on-site Aspect engineer or geologist. Certerra-Geotest tested compaction and confirmed it complied with project specifications. Results of compaction testing are in Appendix L. The final grade across the cleanup area is shown on the as-built drawings in Appendix F (Sheet C-03).

3.8 Stormwater System Replacement

The Site's stormwater drainage and conveyance system was substantially redesigned and enhanced as a part of the upland cleanup. The new stormwater system consists of these components.

- Grading of the surface of the Site so every point on the Site drains inwards and system catch basins are the local low points in the grading.
- Constructing a new block wall around the west and north perimeter of the Site to eliminate sheet flow runoff to the Bay.
- A new stormwater conveyance system consisting of the following:
    - four previously existing and 9 new catch basins on three pipeline main branches that drain the west, central, and east sides of the Site
    - Almost two 2,000 feet of polyethylene storm sewer pipe (PSSP) that convey stormwater to a pretreatment vault and modular wetland near the northwestern corner of the Site. During normal operation all stormwater collected in the system will be directed through the pretreatment vault, the Modular Wetland, then discharge to the bay. If a tenant's stormwater permit requires that stormwater gets a different treatment before

discharge, sluice gate valves can be closed, water pumped from the pretreatment vault to an aboveground water treatment system, then the treated water returned to a manhole downstream of the modular wetland, and from there discharged to the bay.

- A new footing drain installed along the length of the west side of the Warehouse. The footing drain ties into SD Line 7 in the Site stormwater system between CB 5 and CB 6.
- A new tide check valve where the existing stormwater outfall pierces the bulkhead on the north end of the Site to prevent seawater from backing up into the stormwater conveyance system.
- Three new downspouts and a manifold collecting and conveying water from the existing gutters on the west edge of the Warehouse roof to the existing outfall on the west side of the Site. “Y” fittings were installed where the downspouts join the collector manifold to serve as cleanouts and sampling points. The manifold leads to a new pipeline to the existing outfall on the west side of the Site.

The stormwater system was generally constructed in accordance with Construction Plans and Specifications. However, during construction and realignment of the gravity block wall along the northern shoreline to maintain a 1:1 setback from potentially failing shoreline structures, MH 5 was not installed per the original construction plans. Instead, a cleanout was installed to provide access in the interim between the upland and sediment unit cleanup actions. The final stormwater drainage system is shown on the as-built drawings in Appendix F (Sheet C-04)

As a reminder, the current 8-inch outfall at the north shoreline will only support drainage for a 25-year storm event. The outfall must be upsized to an 18-inch outfall to support drainage for a 100-year storm event and prevent flooding. Until the planned sediment unit cleanup and associated in-water work is completed, flooding will remain a risk unless interim modifications are made to increase the size of this outfall.

3.9 Archeological Monitoring

Prior to the beginning of the cleanup activities, a subsurface archaeological site was identified at the southeast corner of CA 1. The archaeological site, Department of Archeology and Historic Preservation (DAHP) Site 45WH0041, contains shell midden and fire-modified rock. The full boundaries of the archaeological materials are not known, and the documented extent was limited to a single test pit dug in 1972.

For the upland cleanup, the Port obtained a DAHP permit for site 45WH0041. All excavation in CA 1 and CA 2 was observed and monitored by an archeologist from ASM Affiliates (ASM). The Inadvertent Discovery Plan (IDP) developed during the DAHP permitting process defined the stop-work and notification procedures to perform in the event of discovering potential archaeological materials while completing the excavation work.

During construction, archeological material consisting of shell midden material was encountered near Site 45WH0041, at a depth of about 1 foot bgs over two discontinuous locations totaling about 100 square yards in area, to the east and north of the eastern end of the Maintenance and Fabrication Shop building. The areas where the archaeological materials were encountered are shown on the as-built drawings in Appendix F (Sheet C-01).

The observing archeologist requested that Strider stop excavating while they conducted their evaluation of the material. The archeologist determined that the material had been disturbed by unknown activities prior to the cleanup. After it was identified, the material was removed from the area where it was found and stockpiled separately from contaminated soil. After excavation was substantially completed, the material was re-buried about 100 feet to the west of where it was encountered at a depth of 3 feet (below the cap) over an area of about 70 square yards. The location of the redeposited archeological materials are shown on the as-built drawings in Appendix F (Sheet C-03).

No other material of historical or archeological significance was encountered during the cleanup project. A copy of ASM's cultural resources report is provided in Appendix M for reference.

4 Upland Cleanup Action Results and Conclusion

Based on the observations and documentation described in this report, the cleanup action was completed in substantive compliance with Ecology's CAP and in accordance with the Construction Plans and Specifications for the upland unit. The completed soil removal action and capping activities have successfully achieved the RAOs and cleanup standards summarized in Section 2.

MNA requirements for the ongoing protection of surface water and sediments, as well as restrictions for protection of the vapor pathway will be institutionalized in the form of an Upland Post-Remedy Compliance Monitoring Plan and an environmental covenant under separate covers as the final step of the upland unit remedy.

5 References

Anchor QEA (Anchor), 2026, Upland Post-Remedy Compliance Monitoring Plan (Ecology Review Draft), Harris Avenue Shipyard, April 2026.

Aspect Consulting (Aspect), 2023, Engineering Design Report for Upland Cleanup Action, Harris Avenue Shipyard, Port of Bellingham, May 2023.

Aspect Consulting (Aspect), 2024, Construction Quality Assurance & Compliance Monitoring Plan, Harris Avenue Shipyard, Port of Bellingham, October 2024.

Floyd|Snider 2019a, Remedial Investigation/Feasibility Study, Port of Bellingham Harris Avenue Shipyard, June 2019.

Floyd|Snider 2019b, Interim Action Construction Completion Report, Port of Bellingham Harris Avenue Shipyard, March 2019.

Washington State Department of Ecology (Ecology), 2021, Cleanup Action Plan, February 2021.

6 Limitations

Work for this project was performed for the Port of Bellingham (Client), and this report was prepared in accordance with generally accepted professional practices for the nature and conditions of work completed in the same or similar localities, at the time the work was performed. This report does not represent a legal opinion. No other warranty, expressed or implied, is made.

All reports prepared by Aspect Consulting for the Client apply only to the services described in the Agreement(s) with the Client. Any use or reuse by any party other than the Client is at the sole risk of that party, and without liability to Aspect Consulting. Aspect Consulting's original files/reports shall govern in the event of any dispute regarding the content of electronic documents furnished to others.

TABLES

Table 1. Cleanup Levels for Contaminants of Concern

Project No. 210195, Harris Avenue Shipyard, Bellingham, Washington

Soil Cleanup Levels (mg/kg)			
Contaminant of Concern	**Based on Industrial Direct Contact**	**Based on Groundwater Protection**	**Cleanup Area Where Cleanup Level Applies**
Heavy Metals			
Arsenic	88	88	CA 1, CA 2, CA 3
Copper	--	390	CA 2
Zinc	--	960	CA 2
Total Petroleum Hydrocarbons (TPH)			
Total TPH	--	24,000[a]	CA 1, CA 2
		8,000[b]	CA 3

Groundwater Cleanup Levels (ug/L)	
Contaminant of Concern	**Based on Discharge to Sediment & Surface Water**
Heavy Metals	
Arsenic	5.0
Copper	3.1
Zinc	81
Polycyclic Aromatic Hydrocarbons (PAHs)	
1-Methylnaphthalene	1.5

Notes:

(a) Soil concentrations in CA 1 and CA 2 less than this cleanup level are protective of all pathways and are not contributing to arsenic leaching at unacceptable levels.

(b) Diesel concentrations in CA 3 soil exceeding 8,000 mg/kg leaching into groundwater can cause anerobic conditions that lead to the leaching of arsenic at unacceptable levels.

Abbreviations:

CA: Cleanup Area (as defined in Site CAP).
mg/kg: milligrams per kilogram. ug/L: microgram per liter.

Table 2. Verification Soil Sample Results

Project No. 210195, Harris Avenue Shipyard, Bellingham, Washington

				Harris CULs	390	960
				Harris CULs_2x	780	1920
Sample Location	**Date**	**Sample Name**	**Depth**	**Excavated**	**Copper [mg/kg]**	**Zinc [mg/kg]**
CA2-A-B1	10/14/2025	CA2-A-B1-3.5	3.5 ft	N	**35**	**100**
CA2-A-B2	10/14/2025	CA2-A-B2-3.5	3.5 ft	N	**48**	**110**
CA2-A-B3	10/14/2025	CA2-A-B3-3.5	3.5 ft	N	**66**	**340**
CA2-A-ESW1-2	10/20/2025	CA2-A-ESW1-2.0-2	2 ft	N	**60**	**140**
CA2-A-ESW2	10/15/2025	CA2-A-ESW2-2.0	2 ft	N	**59**	**160**
CA2-A-WSW1-2	10/20/2025	CA2-A-WSW1-2.0-2	2 ft	N	**64**	**350**
CA2-B-B1	10/14/2025	CA2-B-B1-9.0	9 ft	N	**33**	**77**
CA2-B-B2	10/14/2025	CA2-B-B2-9.0	9 ft	N	**23**	**34**
CA2-B-B3	10/14/2025	CA2-B-B3-9.0	9 ft	N	**18**	**68**
CA2-B-B4	10/14/2025	CA2-B-B4-9.0	9 ft	N	**11**	**52**
CA2-B-B5	10/14/2025	CA2-B-B5-9.0	9 ft	N	**51**	**74**
CA2-B-B6	10/14/2025	CA2-B-B6-9.0	9 ft	N	**28**	**56**
CA2-B-ESW1	10/15/2025	CA2-B-ESW1-3.0	3 ft	N	**550**	**330**
CA2-B-ESW2	10/15/2025	CA2-B-ESW2 - 7.0	7 ft	N	**9.8**	**21**
CA2-B-ESW3	10/15/2025	CA2-B-ESW3-3.0*	3 ft	N	**85**	**120**
CA2-B-ESW4	10/15/2025	CA2-B-ESW4-7.0	7 ft	N	**23**	**39**
CA2-B-SSW1	10/15/2025	CA2-B-SSW1-3.0	3 ft	N	**270**	**570**
CA2-B-SSW2	10/15/2025	CA2-B-SSW2- 7.0	7 ft	N	**15**	**31**
CA2-B-SSW3	10/15/2025	CA2-B-SSW3-3.0	3 ft	N	**130**	**150**
CA2-B-SSW4	10/15/2025	CA2-B-SSW4-7.0	7 ft	N	**16**	**34**
CA2-B-WSW1	10/15/2025	CA2-B-WSW1-3.0	3 ft	N	**120**	**190**
CA2-B-WSW2	10/15/2025	CA2-B-WSW2-7.0	7 ft	N	**420**	**1000**
CA2-B-WSW3-2	10/20/2025	CA2-B-WSW3-3.0-2	3 ft	N	**97**	**200**
CA2-B-WSW4-2	10/20/2025	CA2-B-WSW4-7.0-2	7 ft	N	**160**	**240**
CA2-C-B1	10/13/2025	CA2-C-B1-5.5	5.5 ft	N	**220**	**310**
CA2-C-B2	10/13/2025	CA2-C-B2-5.5	5.5 ft	N	**56**	**170**
CA2-C-B3	10/13/2025	CA2-C-B3-5.5	5.5 ft	N	**37**	**58**
CA2-C-ESW1	10/13/2025	CA2-C-ESW1-2.5	2.5 ft	N	**210**	**270**
CA2-C-ESW2-2	10/16/2025	CA2-C-ESW2-2.5-2	2.5 ft	N	**250**	**300**
CA2-C-ESW3-2	10/16/2025	CA2-C-ESW3-2.5-2	2.5 ft	N	**33**	**46**
CA2-C-NSW	10/13/2025	CA2-C-NSW-2.5	2.5 ft	N	**390**	**1200**
CA2-C-SSW1	10/13/2025	CA2-C-SSW1-2.5	2.5 ft	N	**22**	**43**
CA2-C-SSW2	10/13/2025	CA2-C-SSW2-2.5	2.5 ft	N	**100**	**190**
CA2-C-WSW1	10/13/2025	CA2-C-WSW1-2.5	2.5 ft	N	**360**	**1000**
CA2-C-WSW2-2	10/16/2025	CA2-C-WSW2-2.5-2	2.5 ft	N	**98**	**230**
CA2-C-WSW3	10/13/2025	CA2-C-WSW3-2.5	2.5 ft	N	**55**	**61**

Subsequently Over-Excavated Samples

Sample Location	**Date**	**Sample Name**	**Depth**	**Excavated**	**Copper [mg/kg]**	**Zinc [mg/kg]**
CA2-A-ESW1	10/15/2025	CA2-A-ESW1-2.0	2 ft	Y	**860**	**2200**
CA2-A-NSW1	10/15/2025	CA2-A-NSW1-2.0	2 ft	Y	**170**	**1200**
CA2-A-NSW2	10/15/2025	CA2-A-NSW2-2.0	2 ft	Y	**810**	**2700**
CA2-A-WSW1	10/15/2025	CA2-A-WSW1-2.0	2 ft	Y	**850**	**3100**
CA2-B-WSW3	10/15/2025	CA2-B-WSW3-3.0	3 ft	Y	**40**	**60**
CA2-B-WSW4	10/15/2025	CA2-B-WSW4-7.0	7 ft	Y	**890**	**2200**
CA2-C-ESW2	10/13/2025	CA2-C-ESW2-2.5	2.5 ft	Y	**840**	**2000**
CA2-C-ESW3	10/13/2025	CA2-C-ESW3-2.5	2.5 ft	Y	**1000**	**2500**
CA2-C-WSW2	10/13/2025	CA2-C-WSW2-2.5	2.5 ft	Y	**820**	**1000**

Results in **bold** indicate the analyte was detected above the laboratory reporting limit

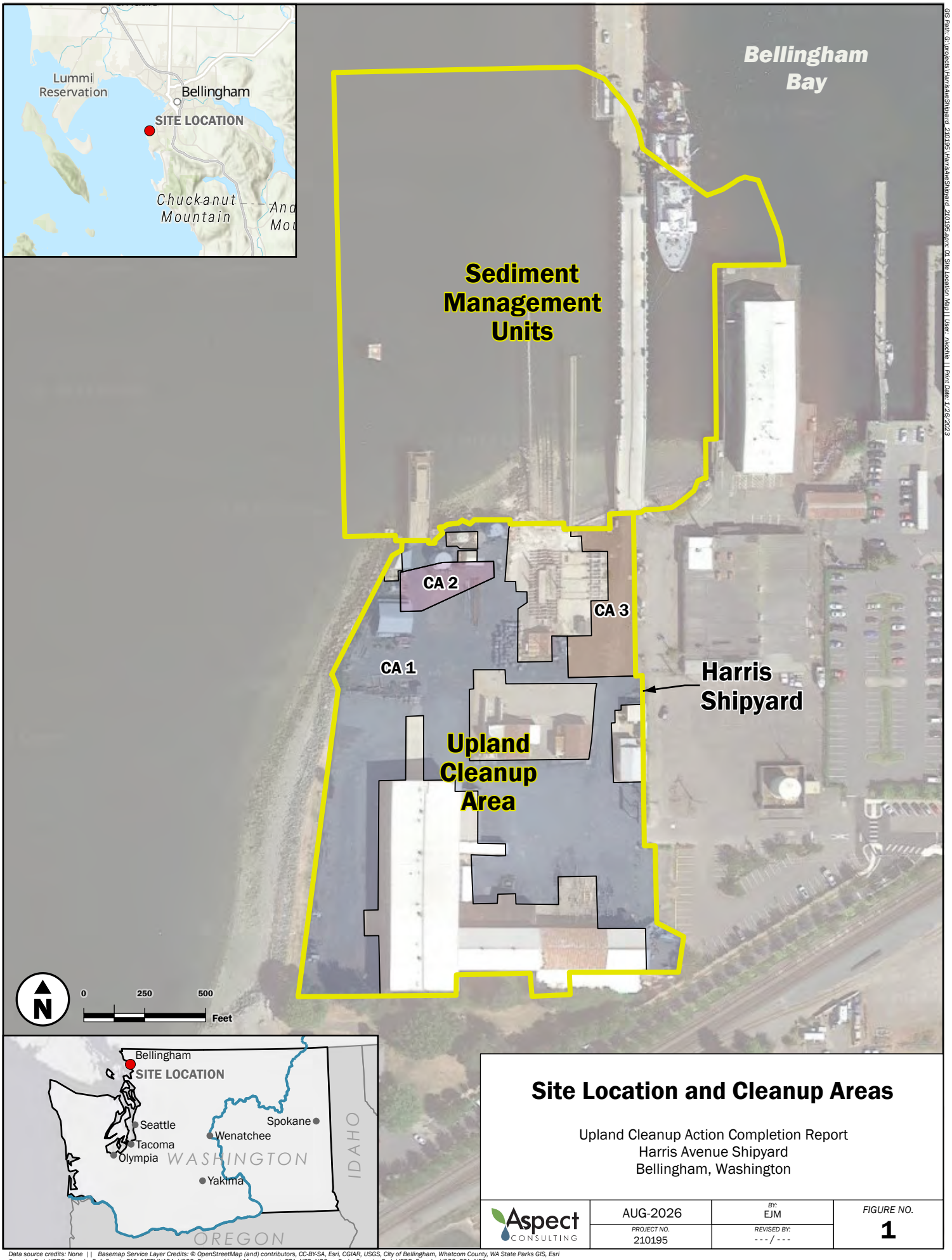
Blue-shaded results indicate that the analyte was detected at a concentration above the cleanup level

Gray text indicates that the sample was excavated.

ft=feet; mg/kg = milligrams per kilogram

*Sample initially called CA2-B-ESW4-3.0 in lab reports. Sample name updated in dataset to be consistent with Location ID (CA2-B-ESW3).

FIGURES



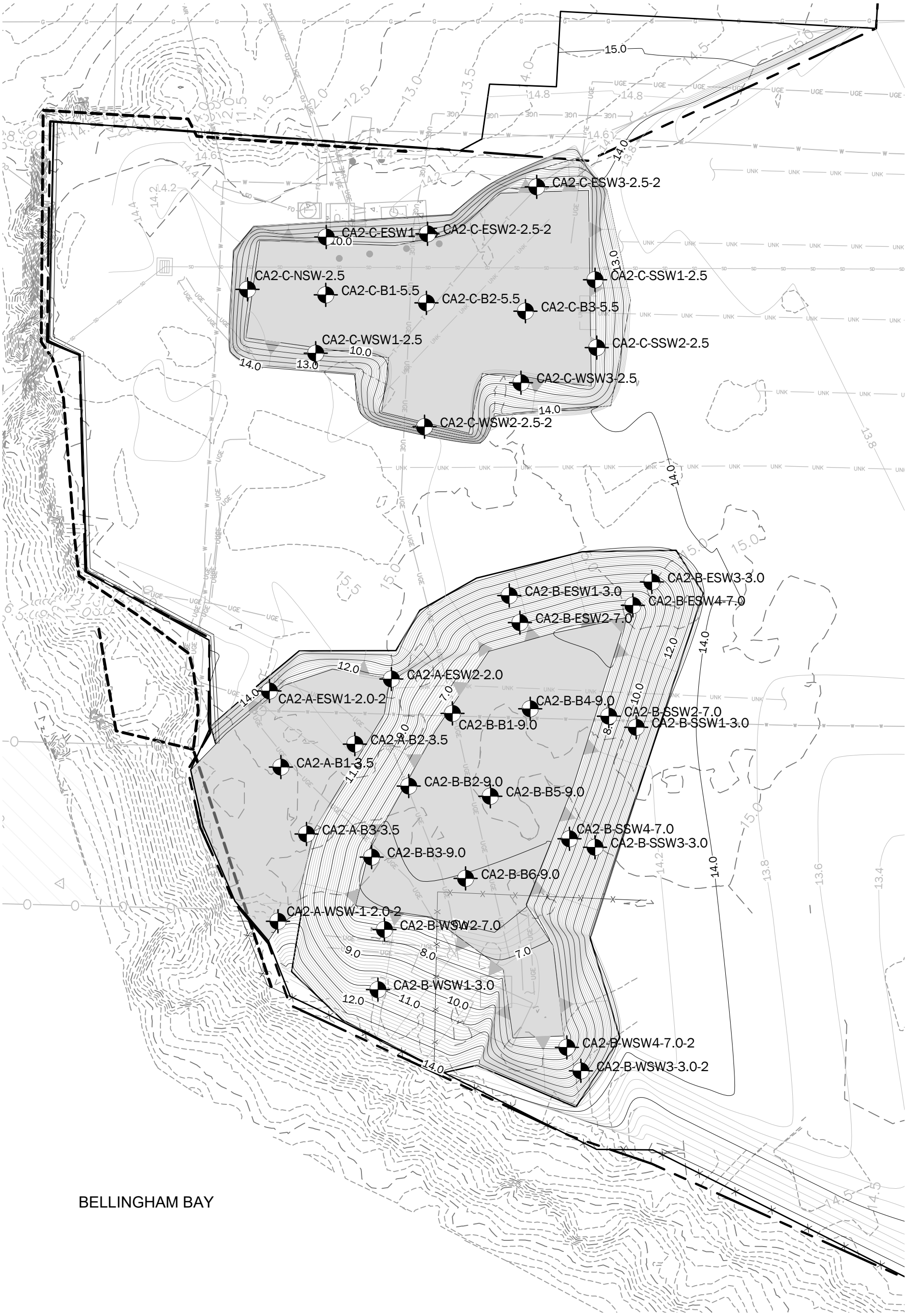
GIS Path: G:\projects\HarrisAveShipyard_210195\HarrisAveShipyard_210195_aprx_01_Site_Location_Map | User: nkohle | Print Date: 1/26/2023

Site Location and Cleanup Areas

Upland Cleanup Action Completion Report
Harris Avenue Shipyard
Bellingham, Washington

Aspect Consulting	AUG-2026	BY: EJM	FIGURE NO. 1
	PROJECT NO. 210195	REVISED BY: ---/---	

Data source credits: None | | Basemap Service Layer Credits: © OpenStreetMap (and) contributors, CC-BY-SA, Esri, CGIAR, USGS, City of Bellingham, Whatcom County, WA State Parks GIS, Esri Canada, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, NRCan, Parks Canada, Esri, HERE, Garmin, USGS, EPA, NPS



LEGEND

13.0 — Cleanup Area Subgrade Contours

Soil Sample Location

Project Limits

0 15 30 Feet

Verification Soil Sample Locations

Upland Cleanup Action Completion Report
Harris Avenue Shipyard
Bellingham, Washington

Aspect Consulting	AUG-2026	BY: EJM/CMV	FIGURE NO. 2
	PROJECT NO. 26005343	REVISED BY: -	

CAD Path: Q:\Port of Bellingham\210195 HarrisShipyd\2023-01 Remed Plans_Regrade 3\As-builts_Fig 2.dwg Layout: Fig 2 || Date Saved: 5/28/2026 11:15:54 AM || User: caroline.vanslyke